

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ALEJANDRO EVARISTO PEREZ  
Plaintiff,

V.

LINKEDIN CORPORATION  
Defendant.

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CIVIL ACTION NO.  
4:20-CV-02188

**SUMMARY JUDGEMENT MOTION IN FAVOR OF PLAINTIFF.**

The Plaintiff files this Motion to SUMMARY JUDGEMENT MOTION IN FAVOR OF PLAINTIFF based on the guidance of the Court Procedures of the Honorable Judge Nancy F. Atlas, the local rules, the Texas Citizens Participation Act, [H.B. No. 2973](#), Anti-SLAPP Laws, Preferred Position Doctrine, the US Constitution, and/or Rule 26(f) of the Federal Rules of Civil Procedures. The 4 legal arguments as follows.

- 1.) The Texas Citizens Participation Act, [H.B. No. 2973](#) allows any US Citizen residing in Texas to freely exercise of our US Constitutional right of free speech, petition, and/or association and to counter any negative legal actions that violate such protected freedoms via Anti-SLAPP laws.
- 2.) The Defendant exercised negative legal actions against the Plaintiff by censoring and exterminating the Plaintiff from his personal social media public forum upon exercising Political Free Speech in a public forum. The Preferred Political Free Speech was and is warnings about the “Clear and Present Danger” regarding the

CCP's "Unrestricted Warfare" Multi Domain Doctrine to the Plaintiff's 7,000 consenting contacts

- 3.) The Defendant's negative legal actions violate the Texas Citizens Participation Act, [H.B. No. 2973](#), because the negative legal actions violates any US Citizen residing in Texas to exercise of our US Federal Constitutional right of free speech, petition, and/or association.
- 4.) The Pro Se Plaintiff has tried multiple attempts to peacefully settle with the Defendant. Defendant has been acting out of malice and "Bad Faith". The Plaintiff does not want to further associate nor interact with the Defendant due to the Defendant's malice, "Bad Faith", nor legal trickery.

### **INTRODUCTION**

The Plaintiff filed a Free Speech violation case by a corporate entity (LinkedIn Inc.), the Defendant. The Defendant behaves and acts as a state actor when censoring material and eliminating the cyber existence of the Plaintiff against the Plaintiff's free will (traditional state actions of censorship and elimination of enemies) from a social media public forum filled US state actors and over 7,000 consenting contacts connected to the Plaintiff, when the Plaintiff exercised Political Speech (which has Preferred Position) to warn about the "Clear and Present Danger" of the foreign state actors, the Chinese Communist Party. The Chinese Communist Party has a record of crimes against humanity, mass murder, forceful territorial expansion (ex.

Tibet), a record of deception, active bioweapons facilities, pictures of Bill Gates (Microsoft is the parent corporation of the Defendant) hand shaking Xi Jinping's hand (the primary leader of such criminal Marxist organization), illegal human organ harvesting, and whose political agenda of "Unrestricted Warfare" directly focuses in undermining the US Constitution by manipulating private corporations to perform un-constitutional state actions in US soil as reported by Ret. US General Robert Spalding, the Trump White House, and the US National Security Council. The CCP's bioweapons are technically responsible for over 1,000,000 human deaths (over 213,000 American deaths) and over 35,500,000 human infections (7,553,000 Americans infested). For such a bioweapon attack, US President Donald Trump is demanding from the United Nations General Assembly to hold the CCP accountable for such crimes against humanity. US President Donald Trump has even been infested by the CCP bioweapons, which is technically an assassination attempt on the President of the United States by the CCP. The Plaintiff requests the help from US Federal Court of the Honorable Judge Nancy F. Atlas in the promotion and defense of the Plaintiff's Constitutional right of Freedom of Speech against the misguided Defendant that performed illegal state actions on behalf of the foreign state actors who has and uses a documented military doctrine to destroy the US Constitution in US soil.

### **LEGAL ARGUMENT**

The Court should approve this motion of SUMMARY JUDGEMENT MOTION IN FAVOR OF PLAINTIFF pursuant to the Texas Citizens Participation Act, [H.B. No. 2973](#), Anti-SLAPP Laws, Preferred Position Doctrine, the US Constitution, and/or Rule 26(f) of the Federal Rules of Civil Procedures based on following factors as expanded.

1.) **The Texas Citizens Participation Act, [H.B. No. 2973](#), allows any US Citizen residing in Texas to freely exercise of our US Constitutional right of free speech, petition, and/or association and to counter any negative legal actions that violate such protected freedoms via Anti-SLAPP laws.** The statute provides for a special motion to the user the ability to dismiss, and/or allows (with some exceptions) to bypass legal procedures via summary judgment. To be specific, the Texas Citizens Participation Act, [H.B. No. 2973](#) states “AN ACT relating to encouraging public participation by citizens by protecting a person's right to petition, right of free speech, and right of association from meritless lawsuits arising from actions taken in furtherance of those rights.” The fact that the Defendant lacks any merits of why the Defendant should censor the Plaintiff, an Honorable US War Veteran living in Texas, on behalf of the CCP, violent mass murdering foreign state actors, transforms this whole case into a meritless lawsuit in favor of the Plaintiff. If the motion is successful, the law allows the court to award the remedies to the party that was negatively affected by the negative legal actions of denying our Constitutional rights of free speech, petition, and/or association. In this case, this Court via this law would protect the Plaintiff, who is the party that was denied our right of right of free speech, petition, and/or association by the Defendant via negative legal action. Each State has their own version of Anti-SLAPP Laws, which may slightly vary in scope. The Plaintiff, an US Citizen and US Army Officer, resides in Texas. By virtue of filing in the Southern District Court of Texas and with the permission of our Honorable Judge

Nancy F. Atlas, the Plaintiff requests that the Anti-SLAPP Laws in Texas be used and in favor of the Plaintiff. Even if the Defendant wishes to refer to their current motions, the fact that the Defendant's motions are yet to approved or denied, which also means the legal case is officially residing in Texas.

2.) **The Defendant exercised negative legal actions against the Plaintiff by censoring and exterminating the Plaintiff from his personal social media public forum upon exercising Political Free Speech in a public forum. The Preferred Political Free Speech was and is warnings about the "Clear and Present Danger" regarding the CCP's "Unrestricted Warfare" Multi Domain Doctrine to the Plaintiff's 7,000 consenting contacts.** Most of the Plaintiff's associations are US Military Fellow Officers, US Corporate Leaders, US Governmental Leaders, business contacts, and friends. The Plaintiff cares for his associations and his fellow US Citizens. The Plaintiff prefers that his associations know the truth and act accordingly to "Clear and Present Danger" of the CCP as set by *Schenck v. United State*. As mentioned in the previous opposed motions by the Plaintiff, the inverse of this famous *Schenck v. United State* case would mean that an American's Freedom of Speech does include the right to use facts (true witness [the inverse of false witness]) to incite actions that would save others [the inverse of harming others]. These means that "Shouting in the Theater" when there is a real fire is protected Free Speech. Above regular protected Free Speech is Political Speech. Political Speech is the most loved and most protected of all Free Speech expression by US Courts, even above regular Free Speech, Hate Speech, and its children corporations, because of the

Preferred Position Doctrine. As documented by Richard L. Parcellle Jr. (2009), a professor and department head in Political Science at the University of Tennessee, the Preferred Position Doctrine expresses a judicial standard based on a hierarchy of constitutional rights so that some constitutional freedoms are entitled to greater protection than others. In the 20th century, the doctrine represented a preference for individual liberties and civil rights. Thus, the standards the Supreme Court used in determining whether there was an infringement on individual liberties and US Constitutional civic rights, especially associated to the US First Amendment, would be more exacting than the reasonableness tests used in evaluating economic issues. But since, this is a Free Speech violation case by scope and definition, the scope of Preferred Position further increases the need for Court to protect the Plaintiff's political statements of criticism of the CCP and the use of "Unrestricted Warfare". The concept of the preferred position doctrine was first mentioned of a hierarchical ordering of constitutional rights came in the majority opinion written by the Honorable [Justice Benjamin N. Cardozo](#) (*Palko v. Connecticut* (1937)). He argued that Americans had a handful of fundamental rights that were the "very essence of a scheme of ordered liberty." Ironically, the original concept mentioned in *Schenck v. United States* (249 US 47 [1919]). The Honorable [Justice Oliver Wendell Holmes Jr.](#) suggested that the Court should not substitute its judgment for that of the legislature in economic matters and introduced the "[clear and present danger](#)" test, which recognized the primacy of the First Amendment and setting the criteria of "Truth/True" to qualify any Free Speech expression for protection. Preferred Political Speech also happens to be Free Speech as protected by The Texas Citizens

Participation Act, [H.B. No. 2973](#), which under article (7) “Matter of public concern” includes issues related to: (7)(A) health or safety; and/or (7)(B) environmental, economic, or community well-being. Therefore, the Court continues to have a legal, moral, and ethical obligation to protect any of the Plaintiff’s “Political Speech” against the Defendant, Chinese Communist Party, and other entities due to Preferred Position Doctrine and The Texas Citizens Participation Act, [H.B. No. 2973](#) (Anti-SLAPP Laws). To summarize all concepts, truthful Political Speech is the most protected speech within our Constitutional right of Freedom of Speech and must be protected by any and all Courts in the USA and the Free World as envisioned by FDR. The Defendant choose to censor and erase the American hero’s Preferred Political Speech who was warning other US Citizens about the “Clear and Present Danger” of the CCP, while the Defendant protected CCP, who are technically foreign mass murders that commit crimes against humanity. Those the Defendant have a moral compass? Such uninvited negative legal actions by the Defendant is very offensive to Plaintiff and to any reasonable American. The reasonable person standard was established by our Honorable Jurist Oliver Wendell Holmes Jr. Based on this judicial standard, the reasonable person will weigh all of the following factors before acting: the foreseeable risk of harm his actions create versus the utility of his actions; the extent of the risk so created; the likelihood such risk will actually cause harm to others; and/or, any alternatives of lesser risk, and the costs of those alternatives. Again. The Defendant willing choose to censor and erase the American hero and defend foreign mass murders, who perform “Crimes against Humanity”. The CCP’s bioweapons are technically responsible for over 1,000,000 human deaths

(over 213,000 American deaths) and over 35,500,000 human infections (7,553,000 American infested). For such a bioweapon attack, US President Donald Trump is demanding from the United Nations General Assembly to hold the CCP accountable for such crimes against humanity. Would more American lives have been saved if the Plaintiff were not exterminated from his LinkedIn account? Would more American lives have been saved if the Plaintiff warned and educated his US High Leadership contacts on the “Unrestricted Warfare” activities of the CCP? Below is the evidence that the Plaintiff is willing to submit to the court in order to understand the “Clear and Present Danger” that the CCP poses to the United States of America and on humanity.

- 1 Copy of the email exchanges between Plaintiff and Defendants’ Moderators
  - Type: email communication
  - Author: [alejandro.evaristo.perez@gmail.com](mailto:alejandro.evaristo.perez@gmail.com), [linkedin\\_support@cs.linkedin.com](mailto:linkedin_support@cs.linkedin.com)
  - Year: 2020
  - Pages: 6
  - LinkedIn Case: 200509-001944
- 1 Copy of the original version of “Unrestricted Warfare” book
  - Type: Military Multi-Domain Operations Doctrine Text
  - Author: PLA Colonel Qiao Liang & PLA Colonel Wang Xiangsui
  - Year: 1999
  - Publisher: Changjiang Literature Press
  - ISBN: 978-7535487407
  - Availability: [Amazon](https://www.amazon.com/gp/product/7535487408/ref=ppx_yo_dt_b_asin_title_o01_s00?ie=UTF8&psc=1)
  - Status: 1 Copy in Plaintiff’s hands to file.
  - Link: [https://www.amazon.com/gp/product/7535487408/ref=ppx\\_yo\\_dt\\_b\\_asin\\_title\\_o01\\_s00?ie=UTF8&psc=1](https://www.amazon.com/gp/product/7535487408/ref=ppx_yo_dt_b_asin_title_o01_s00?ie=UTF8&psc=1)
- 1 Copy of English-translated version of “Unrestricted Warfare” book
  - Type: Military Multi-Domain Operations Doctrine Text
  - Author: PLA Colonel Qiao Liang & PLA Colonel Wang Xiangsui



- Year: Translation based on 1999 by China's People's Liberation Army, Beijing (stated in copy)
  - Publisher & Translation: Echo Point Books & Media LLC
  - ISBN: 978-1-62654-305-8
  - Availability: [Amazon](#)
  - Status: 1 Copy in Plaintiff's hands to file.
  - Link: [https://www.amazon.com/gp/product/1626543054/ref=ppx\\_yo\\_dt\\_b\\_asin\\_title\\_o00\\_s00?ie=UTF8&psc=1](https://www.amazon.com/gp/product/1626543054/ref=ppx_yo_dt_b_asin_title_o00_s00?ie=UTF8&psc=1)
- 1 Copy of "Stealth War" book
  - Type: Military Multi-Domain OPS Counter-Doctrine Text
  - Author: US Air Force Brigadier General Robert Spalding (Ret)
  - Year: 2019
  - Publisher: Penguin Random House
  - ISBN: 9780593084342
  - Availability: [Amazon](#)
  - Status: 1 Copy in Plaintiff's hands to file.
  - Link: [https://www.amazon.com/gp/product/0593084349/ref=ppx\\_yo\\_dt\\_b\\_asin\\_title\\_o07\\_s00?ie=UTF8&psc=1](https://www.amazon.com/gp/product/0593084349/ref=ppx_yo_dt_b_asin_title_o07_s00?ie=UTF8&psc=1)
- 1 Copy of Video Documentary on "The Chinese Communist Party's Ideology and Global Ambitions"
  - Type: Video Documentary
  - Author: Robert C. O'Brien
  - Year: 26 June 2020
  - Publisher: Whitehouse.gov, US National Security Council
  - Special Guest: US New Mexico Governor Doug Ducey
  - Availability: [The White House](#)
  - Link: <https://www.whitehouse.gov/briefings-statements/chinese-communist-partys-ideology-global-ambitions/>
- 1 Copy of Video of President Donald Trump on "We must hold accountable the nation which unleashed this plague onto the world: China" to United Nation General Assembly.
  - Type: Video Documentary
  - Author: President Donald Trump
  - Year: 22 SEPT 2020
  - Publisher: Whitehouse.gov, UNGA, Twitter
  - Availability: [The White House's Twitter Account](#)

- Link:  
[https://twitter.com/WhiteHouse/status/1308428413259177986?fbclid=IwAR2c4I3agLti6mlaoSOL0dDdJMv1BN7umG1TIDi7Qq3dD\\_cHyzE8RD\\_X-dqQ](https://twitter.com/WhiteHouse/status/1308428413259177986?fbclid=IwAR2c4I3agLti6mlaoSOL0dDdJMv1BN7umG1TIDi7Qq3dD_cHyzE8RD_X-dqQ)
- 1 Copy of Video Documentary on “Tracking Down the Origin of the Wuhan Coronavirus”
  - Type: Video Documentary
  - Author: Joshua Phillips
  - Year: 07 April 2020
  - Publisher: Epoch Times | NTD
  - Special Guest: US Brigadier General Robert Spalding
  - Availability: [YouTube](#)
  - Link: <https://www.youtube.com/watch?v=3bXWGxhd7ic>
- 1 Copy of Journalistic Article on “Global CCP Virus Death Toll Surpasses 1 Million” with “The Cover up of the Century” Full Video Documentary.
  - Type: Journalistic Article with Video Documentary
  - Author: Ivan Pentchoukov & Simone Gao
  - Year: 29 SEPT 2020
  - Publisher: Epoch Times | Zooming In with Simone Gao
  - Availability Article: [Link](#)
  - Availability Video: [YouTube](#)
  - Link: [https://www.theepochtimes.com/global-ccp-virus-death-toll-surpasses-1-million\\_3518037.html?utm\\_source=CCPVirusNewsletter&utm\\_medium=email&utm\\_campaign=2020-09-30&fbclid=IwAR0H1VM0XnBfBosyMVeKg2r2Z84YHBNRA5uHnEfhK6EYZ5as11y71pxjjUk](https://www.theepochtimes.com/global-ccp-virus-death-toll-surpasses-1-million_3518037.html?utm_source=CCPVirusNewsletter&utm_medium=email&utm_campaign=2020-09-30&fbclid=IwAR0H1VM0XnBfBosyMVeKg2r2Z84YHBNRA5uHnEfhK6EYZ5as11y71pxjjUk)
- 1 Google Search result of images with the keyword associated with “xi jinping and bill gates” as inputs.
  - Type: Search Engine
  - Author: Miscellaneous
  - Availability: Google
  - Link:  
[https://www.google.com/search?q=xi+jinping+and+bill+gates&sa=X&sxsrf=ALeKk00gmNNI97WfM8nZ\\_bHtXsdfw\\_Q-kw:1597788496735&tbm=isch&source=iu&ictx=1&fir=q-fwCZY83k4SnM%252CGXCMH6\\_OmNSjdM%252C\\_&vet=1&usg=AI4\\_-kRL6DfhG7dw5TrPTo-rcSMxdxc4Gw&ved=2ahUKEwjLoZj-](https://www.google.com/search?q=xi+jinping+and+bill+gates&sa=X&sxsrf=ALeKk00gmNNI97WfM8nZ_bHtXsdfw_Q-kw:1597788496735&tbm=isch&source=iu&ictx=1&fir=q-fwCZY83k4SnM%252CGXCMH6_OmNSjdM%252C_&vet=1&usg=AI4_-kRL6DfhG7dw5TrPTo-rcSMxdxc4Gw&ved=2ahUKEwjLoZj-)

[4aXrAhVJhq0KHZIxCMUQ9QEwAHoECAkQBA&biw=1163&bih=525  
#imgsrc=q-fwCZY83k4SnM](https://www.youtube.com/watch?v=4aXrAhVJhq0&list=PLKHZIxCMUQ9QEwAHoECAkQBA&biw=1163&bih=525#imgsrc=q-fwCZY83k4SnM)

- 1 video documentary “Is Tibet Free? An introduction to Tibet.” from the “Free Tibet” movement.
  - Type: YouTube
  - Author: Free Tibet Movement
  - Availability: [Link](#)
  - Link: <https://www.youtube.com/user/FreeTibetUK>
- 1 website from the “Free Tibet” movement and the violation of civil rights, which includes the shooting of Tibetans.
  - Type: Website
  - Author: Free Tibet Movement
  - Availability: [Link](#)
  - Link: <https://www.freetibet.org/about/human-rights>
- 1 Video Documentary on “How Communist China Weaponized the Waters of Asia—Maura Moynihan on the Three Gorges Dam, Flooding.”
  - Type: Website
  - Year: 2020
  - Author: Maura Moynihan | American Thought Leaders – Epoch Times
  - Availability: [Link](#)
  - Link: [https://www.youtube.com/watch?time\\_continue=142&v=tK3OVqAAWo&feature=emb\\_logo](https://www.youtube.com/watch?time_continue=142&v=tK3OVqAAWo&feature=emb_logo)
- 1 article on “Dangerous Chinese counterfeit goods are pouring into America, here's how we stop it: Morgan, Navarro” allowing for export weaponization.
  - Type: Website
  - Year: 2020
  - Author: Mark Morgan | Peter Navarro | FOXBusiness
  - Availability: [Link](#)
  - Link: [https://www.youtube.com/watch?time\\_continue=142&v=tK3OVqAAWo&feature=emb\\_logo](https://www.youtube.com/watch?time_continue=142&v=tK3OVqAAWo&feature=emb_logo)
- 1 Copy of Invisible Joint Force Multi-Domain Doctrine Tech Deck
  - Type: Military Multi-Domain Doctrine Tech Deck
  - Author: Alejandro Evaristo Perez
  - Year: 2020

- Publisher: Invisible Forge Inc.
- Availability: Confidential & in US Agencies hands
- Status: 1 Copy in Plaintiff's hands to file.
- SEALED: May request to SEALED documentation
- 1 Copy of Invisible Joint Force Multi-Domain Doctrine White Paper
  - Type: Military Multi-Domain Doctrine Text
  - Author: Alejandro Evaristo Perez
  - Year: 2020
  - Publisher: Invisible Forge Inc.
  - Availability: Confidential & in US Agencies hands
  - Status: 1 Copy in Plaintiff's hands to file.
  - SEALED: May request to SEALED documentation

Below are the current activities of the CCP's "Unrestricted Warfare" operations.

## The CCP's Global Communist Purge & Attack

### “Great Invisible Wall of Chinese Bio Plague” + Expansion

#### United States cases

Updated Sep 30 at 2:44 PM local

Confirmed	Deaths	Recovered
7,287,348	209,269	3,893,937
+57,789	+934	+22,982

#### Global cases

Updated Sep 30 at 2:44 PM local

Confirmed	Deaths	Recovered
33,785,178	1,010,147	23,448,934
+331,141	+6,576	+244,715



Goal: Mass murder 20% of World Population via multiple pandemics by using invisible bioweapons from the Wuhan P4 Laboratories (1,000 variants stored), bribed mass medias (LinkedIn), & undermining Global Institutions (WHO), in order to take South China Sea territory and India border during pandemics. Next possible attack is contaminating “Made in China” exports and Water Operations Weaponization (ex. Global Floods & Hunger Gaming)



“The whole secret lies in confusing the enemy, so that he cannot fathom our real intent.”

— Sun Tzu, The Art of War & The CCP's Military Playbook



3.) **The Defendant's negative legal actions violate the Texas Citizens Participation Act, [H.B. No. 2973](#), because the negative legal actions violates any US Citizen residing in Texas to exercise of our US Federal Constitutional right of free speech, petition, and/or association.** The Defendant performed such negative legal actions of censorship and character erasing in a forum of associations, which is clear violate of the scope of [H.B. No. 2973](#). The Defendant's immoral legal action of censorship directly violates our Constitutional right to free speech. The Defendant's immoral legal action of virtually erasing the Plaintiff from a public forum is a violation our Constitutional right of association. The Plaintiff is a lawful US Citizen and an Honorable US War Veteran who had and has lawful consent to talk and



interact with his associations in the public forum as both a customer and content creator while in residing in Texas. The Defendant's actions are willingly, forcefully, and without the consent of the Plaintiff. The Plaintiff does not consent of the negative legal actions of censorship and disassociation that the Defendant has performed. If Bill Gates and Ryan Roslansky wanted to communicate with the Plaintiff in LinkedIn and shared their views with the Plaintiff of why the CCP is not a bunch of mass murders and unethical repo men, who willing infest us with their bioweapons generated by the P4 Wuhan Laboratory, then Bill Gates and Ryan Roslansky should have first requested consent to connect with the Plaintiff. If consent is granted by the Plaintiff, then and only then could Bill Gates and Ryan Roslansky communicated with their views with the Plaintiff on why the Plaintiff should not inform the Plaintiff's 7,000 consenting contacts of the "Clear and Present Danger" that the Chinese Communist Party represents. Even now, Bill Gates, Ryan Roslansky, and his representatives failed to provide any logical evidence to the contrary. This is the virtual equivalent of a hotel owner shooting an US Citizen in a Texas hotel room that was rented properly, because the US Citizen was talking to his friends and associations about the "Clear and Present Danger" presented by the Chinese Communist Party, which clearly violates our US Constitutional Free Speech by the Texas Citizens Participation Act, [H.B. No. 2973](#).

- 4.) The Pro Se Plaintiff has tried multiple attempts to peacefully settle with the Defendant. Defendant has been acting out of malice and "Bad Faith". The Plaintiff does not want to further associate nor interact with the Defendant due**

**to the Defendant's malice, "Bad Faith", nor legal trickery.** The Defendant has more legal consults and more law advisors than the Pro Se Plaintiff, which means that the Defendant would have known about the Anti-SLAPP Laws and other case law doctrines if the Defendant's legal consults and advisors are competent and talented. Assuming that Defendant and his army of legalists (LinkedIn has a legal department) are competent and talented due to their prior lawsuits, the Defendant has been acting out of malice and "Bad Faith" against the Plaintiff, which further proves the Pro Se Plaintiff's needs to perform "an Offensive Anti-SLAPP Slap" summary judgement to end the legal case to avoid such twisted legalistic sadists. Again. Plaintiff does not want to further associate nor interact with the Defendant due to the Defendant's malice, "Bad Faith", nor legal trickery. Bill Gates, Ryan Roslansky, and his representatives can do their research on who the CCP really is and what is "Unrestricted Warfare" multi domain doctrine is on their own time. Not in the Federal Court's time, not in the Honorable Judge Nancy F. Atlas's time, and not in the Plaintiff's time. The Defendant and their representatives need to perform their own research in their own time and not waste everyone else's time. The Defendant censoring and erasing the Plaintiff in Texas was never necessary, a waste of time, technically part of the CCP's "Unrestricted Warfare" to turn American against American, directly violates the Texas Citizens Participation Act, [H.B. No. 2973](#), and clearly violates our US Constitutional Freedoms that the Plaintiff and many other brave US War Veterans have fought for.

### **LEGAL CONCLUSION**



For those reasons, the Plaintiff continues to request the 3 reliefs requested.

First, the Plaintiff wants his LinkedIn account restored with all 7,000+ Connections that consented to connect and peacefully assembled with the Plaintiff via their freewill.

Second, \$1,000,000,000 of relief to the Plaintiff. This is an update from previous 2 motions and over many attempts to settle without a single attempt to settle from the Defendant. Due to the fact that the Defendant showed no pity and the Plaintiff is a “Man after God’s Heart” who believes that “He (the Defendant) must pay for that ewe lamb four times over, because the greedy rich man stole and killed the poor’s only ewe sheep to foreigners and had no pity” – 2 Samuel 12:6.” The fact is that the plaintiff is a US Army Officer whose only job and oath is to protect the US Constitution and the risks associated with such a function. These risks can include death by foreign state agents and, more apperantly, oppression of proudful misguided industrialists that curse the Plaintiff with negative legalistic counsel instead of sending peacemakers. The Plaintiff was ready to mediate a peaceful settling with Defendant. The Plaintiff wanted to avoid unnecessary legal administration and show some “social grace” toward Bill Gates, Ryan Roslanksy, and the LinkedIn team by avoiding negative media attention and keep the LinkedIn “Golden Goose” healthy with an FDR’s “4 Freedoms” diet. Instead, the Defendant show only ill-will and proud behavior toward Plaintiff. The Defendant is very proud of the fact that they violated the “Free Speech” of a US War Veteran who fought for our right for Freedom of Speech. And continues to be so, even after multiple requests by the Plaintiff to drop the “Motion to Transfer”. The Defendant is still very proud of the fact that they virtually assassinated the Plaintiff’s avatar in front of his 7,000 global connections. The Defendant was untouched and

unmoved by a punitive original amount of \$250,000,000 making the Plaintiff uncertain about the impact of the relief on the minds of the mega wealthy. And further untouched by the \$500,000,000 amount when raised and requested to surrender. Is \$500,000,000 still pocket change to the mega wealthy? The Defendant refuses to show a metaphorical ounce of humbleness nor any expression of regret for their unethical actions. The Defendant has failed to make a single attempt to settle with Plaintiff. Thus, being the better person and hero of the case, the Plaintiff is still humble enough to agree that the Plaintiff is still underestimating the punitive amount that would emotionally move very proud proud proud proud American mega titans of industry to reconsider their unethical actions and recalibrate their moral compasses toward the Free World. If approved by the Court, the Plaintiff is vowing and planning to double the punitive amounts for every delay motion or counter motion introduced by the Defendant in order to expediate justice and maybe find an amount that will emotionally move the cold hearted Defendant toward reconciliation. Originally, the original \$250,000,000 amount was also intended to attract a high quality US Constitutional lawyer to represent the Plaintiff, but failed to materialize due to the risks associated with unethical stakeholders. The Plaintiff was forced to become a Pro Se Party and perform the legal functions required to win and safeguard our American Freedoms. Such a large relief amount will make LinkedIn leadership rethink any censorship actions against any US Citizens in favor external evil governments that perform “crimes against humanity” and thus, a real topic for the corporate board of directors. This should remind the LinkedIn leaders to stop behaving as state actors. **The Plaintiff is warning the Defendant that opposing this motion will mean an additional doubling to a new amount of \$2,000,000,000 of punitive amount, because an opposing motion would be another delay**

**action and a new attempt of defend their unethical unpatriotic behavior while wasting everyone's time and energy on behalf of the Chinese Communist Party.**

Third, as repeatably recommended, the Plaintiff continues to purse an update to LinkedIn User Agreement to reflect general spirit of Franklin D. Roosevelt's 4 Freedoms via the 10 Universal Rights (US Constitutional and UN Articles), which is a higher standard of Free Speech and Corporate Conduct than LinkedIn's current state actions of elimating the Plaintiff from a public forum by force.

I, the Plaintiff, filed this motion to the best of his humanly abilities as a Pro Se Plaintiff based on the guidance of the Court Procedures of the Honorable Judge Nancy F. Atlas, the local rules, the Texas Citizens Participation Act, [H.B. No. 2973](#), Anti-SLAPP Laws, Preferred Position Doctrine, the US Constitution, and/or Rule 26(f) of the Federal Rules of Civil Procedures.

God bless America.

/s/ Alejandro E. Perez

06OCT2020

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Alejandro Evaristo Perez  
Plaintiff | 4:20-CV-02188  
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Phone: (214) 762-0075  
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Date